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**From:** Anderson, Kate [Anderson.Kate@epa.gov]  
**Sent:** 10/4/2018 5:50:25 PM  
**To:** Bodine, Susan [bodine.susan@epa.gov]  
**CC:** Starfield, Lawrence [Starfield.Lawrence@epa.gov]; Traylor, Patrick [traylor.patrick@epa.gov]; Dombrowski, John [Dombrowski.John@epa.gov]  
**Subject:** Draft joint OAR-OECA Memo to Regions on CAA ADIs related to Major Source reclassifications

Susan,

A package is on its way for your review that contains a proposed memorandum that would be jointly signed by you and Bill Wehrum. The draft memorandum has gone through OAR review and approval and it is now ready for OECA review and approval.

**Background:**

OAQPS, with OECA (OC, OCE) and OGC input, drafted a memorandum to assist Regional offices in determining when it is appropriate to reference or incorporate information from the 2018 Reclassification Memorandum ("Reclassification of major Sources as Area Sources under Section 112 of the Clean Air Act") in responses to CAA Applicability Determination (AD) requests. The guidance provided in the memo will ensure consistency and legal accuracy among the Regions in preparing applicable MACT ADs. Currently, the memo has been drafted for joint signature by the OECA and OAR AAs. The draft memo has been approved through Bill Wehrum.

**Actions Needed:**

- (1) Your decision to either sign the joint memo or due to the shift of ADIs to OAR, you may decide to have OAR sign only.
- (2) If you decide to sign, your review and any edits that you would like to the memorandum. Once we have your decision, we will inform OAR to finalize the memo.

Thanks.

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Kate Anderson  
Acting Deputy Director  
Office of Compliance  
US EPA  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460  
202-564-0278 (office)  
202-253-3140 (cell)